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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

Case No.: 16-12453
Chapter 11 Reorganization

15 JOHN CORP.,
a/k/a LES HALLES,
a/k/a FIRST ADMIN INC.

Debtor.

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**SUPPLEMENTAL APPLICATION FOR COMPENSATION
OF PHILLIPE LAJAUNIE AS PRESIDENT OF THE DEBTOR**

15 John Corp., a/k/a Les Halles, a/k/a First Admin Inc., the Debtor and Debtor-in-Possession herein (the “Debtors”), by its attorney, Leo Fox, Esq., make this application (the “Application”) for entry of an Order (the “Order”), pursuant to Sections 522 of the Bankruptcy Code and respectfully represents:

INTRODUCTION

1. On August 25, 2016 (the “Petition Date”), the Debtors filed voluntary petitions in this Court for relief under Chapter 11 of the Code. The Debtors continue to operate their businesses as a Debtor-in-Possession pursuant to Code §§ 107(a) and 1108.
2. By Application dated March 17, 2017, an Application was made to provide for compensation payments to Phillip Lajaunie. This Supplemental Application is made to supplement the prior Application and to make full disclosure. It appears that Mr. Lajaunie was of the impression that he, as an the sole officer and principal, was entitled to be paid his compensation based on the agreement with the Class Action Plaintiffs and his role as officer. He

has received compensation previously. He received compensation of \$12,000 since January 2017, based upon the \$6,666.66 per month level of compensation.

3. The Debtor respectfully submits that this disclosure should not change the result of this Application to make this request. As an officer, and in light of his contributions, he should have been entitled to paid since the filing.

4. Pursuant to term sheet dated February 6, 2017, the Debtor and the Class Action Plaintiffs holding claims of \$5,000,000 have entered into a settlement providing the basis for the settlement of the Class Action Plaintiff's claims and submission and confirmation of a Plan of Reorganization. Pursuant to that term sheet, the Class Action Plaintiffs have agreed that Phillip Lajaunie, the Debtor's principal, and President, is entitled to receive salary in the amount of \$80,000 during 2017 (Section 4.1.1 of the term sheet).

5. It is respectfully requested that an Order be entered authorizing Phillip Lajaunie to take compensation of \$6,666.66 per month. Phillip Lajaunie has invested substantial amounts of time to the Debtor's success, has advanced funds, including the retainer to the Debtor's attorneys, has agreed to post the 100% equity interest of the Debtor into escrow and to release all claims against the Debtor for all monies being advanced by Phillip Lajaunie under the Plan.

6. It is submitted that a working officer of the debtor corporation is entitled to be paid a fair salary for his work. Here, Phillip Lajaunie's salary is substantially below what his salary was prior to the Chapter 11 case and what his reputation and experience would entitle him to receive. He should be entitled to be paid his compensation.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order:
(a) authorizing Mr. Lajaunie to be paid his compensation and reimbursement of expenses of the

Retained Professionals on a monthly basis; and (b) granting the Debtor such other and further relief as may be just and proper.

Dated: New York, New York
March 20, 2017

***15 JOHN CORP.
a/k/a LES HALLES
a/k/a FIRST ADMIN INC.***

By: ***Isaac Fox***
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